

From: Kimberly Samuelson [mailto:KSamuelson@Laserfiche.com]
Sent: Monday, January 24, 2011 1:47 PM
To: Finger, Theresa
Subject: Comment on proposed regulations

January 24, 2011

Theresa Aguilar Finger, Special Projects Manager, MBA/TM, C.P.A.
Secretary of State
1500 11th Street, 6th Floor
Sacramento, CA 95814

RE: Proposed Trustworthy Electronic or Record Preservation

Dear Ms. Aguilar Finger,

Laserfiche has reviewed the proposed recommendations cited from AIIM, ARP1-2009, Section 5.4.1.4, Image Formats. While we agree with many of the recommendations we find one, which states, that "Caution should be exercised if using TIFF, " seriously flawed. We believe this recommendation send the wrong message to technology users and developers in California and by extension, throughout the world. Presently there are thousands of state and local government organizations that have selected TIFF as a proven archival standard. Many developers of records management software applications use TIFF because it is robust and non-proprietary. Laserfiche customers, for example, some of whom have archived their documents as TIFF images for over 20 years, have ready access to those images today. Because it is open architecture, system performance is continuously enhanced by concurrent advances in hardware, software and communication technologies.

Further, your assertion that the use of TIFF requires wrappers or headers is patently false.

While TIFF allows the use of wrappers or headers, it is certainly not standard, nor is it a recommended practice. Twenty-five years of ECM software development experience allows us to recommend and assert that:

- Images should be stored in TIFF standard compression format to ensure long term accessibility.
- Best practice does NOT allow storage of metadata in the TIFF header through the use of proprietary tags or wrappers.
- TIFF images should be stored securely as read-only on the file system so that they are unalterable.
- TIFF images should be encrypted so that unauthorized access is mitigated.

While standards for long-term preservation of information are critical, they should not hinder innovation at a time when demand for access to information in different formats is continually increasing. Cautioning against TIFF would directly limit innovation without bringing benefits to state and local entities. It is widely known in the programming community that few software development toolsets are available for PDF versus the vast array of toolsets that are available for TIFF. Additionally, the increasingly mobile nature of today's workforce requires us to deliver information in the most device-centric manner possible. TIFFs—rendered as PNG files “on the fly” are both browser and network-bandwidth friendly.

Adapting this recommendation would put California ECM users and developers at a severe technological disadvantage. It is astonishing, the California Secretary of State's office would

impose such restrictions on an industry that plays such an important role in California's economic strength.

For these reasons and others, we strongly recommend that the Secretary of State not adopt the proposed recommendations.

Sincerely,

Kimberly Samuelson

Kimberly Samuelson, Director of Government Marketing
Phone: 562-988-1688 ext. 152
Email: ksamuelson@laserfiche.com
Web: www.laserfiche.com

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